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1st TECHNOLOGY LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1ST TECHNOLOGY LLC, Plaintiff, v. IQ-LUDORUM PLC, PLAYTECH CYPRUS LTD., TILTWARE LLC, and KOLYMA CORPORATION, A.V.V., Defendants.	CV-S-06-__________ **JURY DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff 1st Technology LLC ("1st Technology"), complains of Defendants IQ-Ludorum PLC, Playtech Cyprus Ltd., TiltWare LLC and Kolyma Corporation, A.V.V. (collectively "Defendants") as follows:

JURISDICTION AND VENUE

1. Jurisdiction exists under 28 U.S.C. § 1338(a) because Defendants are charged with patent infringement under 35 U.S.C. § 271.

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2. Defendants each have transacted business in this judicial district by making, using, selling or offering to sell and distributing software products that violate 1st Technology's patent either in this judicial district or in the United States.

3. Venue is proper under 28 U.S.C. §§ 1391(d) and 1400(b).

PARTIES

4. 1st Technology is a California limited liability company with offices at 654 North Santa Cruz Avenue #C169, Los Gatos, California 95030. 1st Technology is the assignee of and owns all right, title and interest in and has standing to sue for infringement of United States Patent No. 5,564,001 entitled "Method and System for Interactively Transmitting Multimedia Information Over a Network Which Requires Reduced Bandwidth" ("the '001 Patent").

5. IQ-Ludorum PLC ("IQ-Ludorum") is a foreign company with offices at 28 Eccleston Square, Victoria, London SW1V 1NS, United Kingdom. IQ-Ludorum has previously and is presently making, using, selling, offering for sale, and/or importing into the United States software products that infringe one or more claims of the '001 Patent. IQ-Ludorum has infringed the '001 Patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

6. Playtech Cyprus Ltd. ("Playtech") is a foreign company with offices at Athinadorou 3 Street, Dasoupolis, 2025 Strovolos Nicosia, Cyprus. Playtech has previously and is presently making, using, selling, offering for sale, and/or importing into the United States software products that infringe one or more claims of the '001 Patent. Playtech has infringed the '001 Patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

7. TiltWare LLC ("TiltWare") is a California company with offices at 10866 Wilshire Blvd., 4th Floor, Los Angeles, California, 90024. TiltWare has previously and is presently making, using, selling, offering for sale, and/or importing into the United States software products that infringe one or more claims of the '001 Patent. TiltWare has infringed the '001 Patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

8. Kolyma Corporation, A.V.V. ("Kolyma") is a foreign company with offices at 62 Lloyd G. Smith Blvd., Oranjestad, Aruba. Kolyma has previously and is presently using, selling, offering for sale, and/or importing into the United States software products that infringe one or more claims of the '001 Patent. Kolyma has infringed the '001 Patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

BACKGROUND

9. Dr. Scott Lewis ("Dr. Lewis") is an individual residing in Los Gatos, California. Dr. Lewis is the controlling manager of 1st Technology LLC. Dr. Lewis is the inventor of the '001 Patent.

10. Dr. Lewis received B.S. and M.S. degrees with honors in mechanical and electrical engineering from M.I.T. Dr. Lewis has a Ph.D. from Oxford University in adaptive digital signal processing as a Marshall Scholar and an M.B.A. from Harvard Business School. Dr. Lewis led the development of single-chip video and audio compression solutions, as well as the first automotive video cellular telephone.

11. Dr. Lewis is the inventor of a number of patents in multimedia communication technology including the separation, processing and recombination of multiple streams of multimedia data. This processing can include enhancement, compression and other forms of data manipulation. The inventions of Dr. Lewis' patents are used in many online wagering systems.

PATENT INFRINGEMENT

12. Each of the Defendants has infringed the '001 Patent either directly or through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271.

13. IQ-Ludorum has infringed and continues to infringe at least Claim 26 of the '001 Patent.

14. Playtech has infringed and continues to infringe at least Claim 26 of the '001 Patent.

15. TiltWare has infringed and continues to infringe at least Claim 26 of the '001 Patent.

16. Kolyma has infringed and continues to infringe at least Claim 26 of the '001 Patent.

17. Defendants' infringement, contributory infringement and/or inducement to infringe has injured 1st Technology and it, therefore, is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

18. Each of defendant IQ-Ludorum, Playtech and TiltWare's infringement, contributory infringement and/or inducement to infringe has been willful and deliberate because each of defendant IQ-Ludorum, Playtech and TiltWare has been given notice of or knew of the '001 Patent and has nonetheless injured and will continue to injure 1st Technology, unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further manufacture, use, sale and/or offer for sale of products or services that come within the scope of the '001 Patent.

JURY DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, 1st Technology requests a trial by jury on all issues presented that can properly be tried to a jury.

WHEREFORE, Plaintiff, 1st Technology, asks this Court to enter judgment, individually and jointly against defendants IQ-Ludorum PLC, Playtech Cyprus Ltd., TiltWare LLC, and Kolyma

Corporation, A.V.V., and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

A. An award of damages adequate to compensate 1st Technology for the infringement that has occurred, together with prejudgment interest from the date infringement began;

B. All other damages permitted by 35 U.S.C. § 284;

C. A finding that this case is exceptional and an award to 1st Technology of attorneys' fees and costs as provided by 35 U.S.C. § 285;

D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the '001 Patent; and,

E. Such other and further relief as this Court or a jury may deem proper and just.

DATED this 15th day of March, 2006.

Respectfully submitted,

[signature]

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